



March 5, 2014

Ms. Marlene Dortch
Federal Communications Commission
445 12th Street, SW
Washington, DC 20554

Re: Expression of Interest Letter – WC Docket 10-90, Connect America Fund

Dear Ms. Dortch,

On the part of Sacred Wind Communications, Inc. and the Pueblo of Laguna Utility Authority, this letter is submitted to Express Interest in participating in the Rural Broadband Experiments. Sacred Wind Communications, Inc. (“Sacred Wind”) is an incumbent Rate of Return local exchange carrier providing voice and broadband services to rural, mainly tribal, consumers for over seven years in rural New Mexico with an average density of 1.6 customers per square mile. Sacred Wind has newly installed service to over 1,500 tribal homes since its inception and is one of the few local exchange carriers that is experiencing consistent access line growth each year. This track record proves that Sacred Wind has the experience and dedication to rural consumers needed to successfully deploy broadband in unserved areas. Sacred Wind has also developed a broadband system for the Laguna Pueblo and works well with the Navajo Nation and

Laguna tribal government. The Pueblo of Laguna Utility Authority (“PoLUA”) is a wholly owned affiliate of the Pueblo of Laguna, a Keres-speaking tribe whose federally recognized reservation is located between Albuquerque and Gallup, New Mexico, adjacent to a portion of Sacred Wind’s certificated service territory. PoLUA is managing a fiber to fixed wireless broadband system for the Pueblo’s six villages, constructed by Sacred Wind and operating under Sacred Wind’s mentorship.

Broadband networks, particularly high-speed broadband networks, are expensive to build and cost recovery typically requires multiple years in rural high-cost areas and, therefore, Sacred Wind and PoLUA are very interested in partnering with the FCC to conduct experiments to find creative ways of deploying high-speed, scalable, IP-based networks in rural extremely high-cost areas outside of its certificated service territory. In particular, Sacred Wind and PoLUA recognize the need for service to be available to local schools, hospitals and other anchor institutions to ensure rural economic development and opportunity for all Americans. To that end, Sacred Wind and PoLUA will take steps to ensure our experiments maximize accessibility for all anchor institutions in the proposed areas. The details of our potential experiment are found below.

Location of Potential Experiments

Sacred Wind and PoLUA are interested in providing service to eligible locations in Census Tracts 07145 and 71510, within Cibola County, New Mexico, occupied by Bibo and Seboyeta, somewhat isolated unincorporated rural villages located one and two miles north of Laguna Pueblo. Sacred Wind would need to extend optical fiber from its current fiber network approximately 24 miles from the nearest connection to Laguna Pueblo’s optical fiber facilities. PoLUA would need to extend optical fiber another 2 1/2 miles to reach a monopole to be placed in both Bibo and Seboyeta. According to the FCC’s release of potentially eligible Tracts, there are roughly 121 eligible, occupied locations within the Tracts of these two communities covering approximately 20.5 square miles with an average density of 6.0 locations per square mile. This area is currently served by an incumbent that has not been able to expand service or introduce broadband to the occupants.

<i>Census Tract Number</i>	<i>Number of Locations</i>	<i>Number of Anchor Institutions</i>
07145	54	0
71510	67	0

Broadband Technology

Based on the funding level available, Sacred Wind and PoLUA would extend fiber from current fiber routes owned by both Sacred Wind and the Pueblo to a fixed wireless communications tower in the extremely rural communities of Bibo and Seboyeta, north of Laguna Pueblo. From those towers PoLUA would deliver broadband to all eligible locations within those two rural communities by way of subscriber radio units attached to the premise.

Service Offerings

The IP Network described above would be capable of supporting voice, high-speed broadband of at least 4Mbps downstream and 1Mbps upstream up to 10 Mbps downstream and 1 Mbps upstream. Anchor institutions would be able to receive broadband at 10 Mbps downstream and 1 Mbps upstream, or higher if required. The exact prices of these services still need to be determined; however, they will likely be similar to PoLUA's current offerings to its existing customers:

Monthly rates

1Mbps/1Mbps - \$35.00

2Mbps/1Mbps - \$45.00

4Mbps/1Mbps - \$55.00

10Mbps/1Mbps - \$75.00

Existing Providers

Although CenturyLink serves the communities of Bibo and Seboyeta, the proposed experiment area, the service, over an obsolete copper landline network, is limited to voice service and is often unreliable. The incumbent's service is inferior to the network that Sacred Wind and PoLUA would deploy in their experiment and it is

therefore in the public interest for the FCC to deviate from its general policy of not supporting two or more providers in an area.

Tribal and Community Participation or Partnerships

Sacred Wind and PoLUA expect full Laguna Pueblo and local community support for the project including expedited permitting for access to rights of way for short optical fiber extensions and for fixed wireless facilities.

Necessary Funding

Sacred Wind and PoLUA estimate that this experiment will require \$910,000 to construct the required facilities. Accordingly, Sacred Wind and PoLUA would require this amount in one time funding or to be paid out over a 5 year period. PoLUA also would require some level of recurring support for at least the first two years to cover the incremental costs incurred associated with processing and fulfilling service orders and maintaining customer service during the initial period of heightened customer service installations. That recurring support should not exceed \$15 per month per subscriber. Sacred Wind and PoLUA thank the FCC for the opportunity to participate in this process. Any questions about this letter of interest should be directed to John Badal at the information below.

Sincerely,

A handwritten signature in dark ink, appearing to read 'JB L', with a stylized flourish at the end.

John Badal, CEO
Sacred Wind Communications, Inc.
7801 Academy Rd, NE – Bldg 2
Albuquerque, New Mexico 87109

Map of Fiber extension from Laguna Pueblo to Bibo and Seboyeta

